

# **EXHIBIT 264**

DENISE GEORGE Confidential  
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023

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CONFIDENTIAL  
UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK  
CASE NUMBER: 22-CV-10904-JSR  
ACTION FOR DAMAGES

GOVERNMENT OF THE UNITED STATES )  
VIRGIN ISLANDS, )  
 )  
Plaintiff, )  
 )  
VS. )  
 )  
JP MORGAN CHASE BANK, N.A., )  
 )  
Defendant. )  
 )

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VIDEO RECORDED DEPOSITION OF  
DENISE GEORGE  
MONDAY, JULY 17, 2023

REPORTED BY:

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1 The time is 2:37.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. So, Ms. George, I understand  
4 you had a discussion with your counsel  
5 while we were off the record about a  
6 question I asked you earlier today,  
7 correct?

8 A. Yes.

9 Q. And the question that I'd  
10 asked you earlier today was about your  
11 personal E-mails and references to  
12 Jeffrey Epstein in those E-mails,  
13 correct?

14 A. Yes.

15 Q. And you had earlier refused to  
16 answer that question, correct?

17 A. Yes.

18 Q. And you now want to now revise  
19 that answer, correct?

20 A. Yes.

21 Q. Okay. What is the answer?

22 A. That there are E-mails,  
23 information within my personal E-mail  
24 that is directly related to  
25 information from my DoJ E-mail that I

1 was working on while I was Attorney  
2 General and sent to -- by myself to my  
3 personal E-mail to work on.

4 Q. Okay. So you would have  
5 forwarded E-mail from your work as  
6 Attorney General to your personal  
7 account?

8 A. Yes.

9 Q. Okay. Setting aside those  
10 E-mail -- E-mails, are there any other  
11 E-mails regarding Jeffrey Epstein in  
12 your personal E-mail that you're aware  
13 of?

14 A. Not I'm aware of.

15 Q. Okay. And you have no reason  
16 --

17 A. I don't recall.

18 Q. -- to think there would be?

19 A. Yeah. I don't recall anything  
20 else. I don't recall that, no.

21 ATTORNEY ACKERMAN: Okay. And  
22 just to be -- to be clear,  
23 counsel, the witness has concerns  
24 about descriptions of her personal  
25 E-mail.

1           He just brought it to my  
2           attention that this is what  
3           Jeffrey Epstein wants, and -- and  
4           I can expect a call from his  
5           attorney.

6           (BY ATTORNEY O'LAUGHLIN) :

7           Q. And did Government Bryan  
8           express a position one way or the  
9           other, or he was just asking for you  
10          to make your decision?

11          A. He expressed his position but  
12          he -- but he asked me to make a  
13          decision --

14          Q. What was the --

15          A. -- but didn't tell me what the  
16          decision was.

17          ATTORNEY ACKERMAN: So this is  
18          where the specifics of the  
19          conversation between Governor  
20          Bryan and Attorney General are  
21          governed by executive privilege  
22          and by deliberative process, given  
23          the manner that Attorney General  
24          just mentioned that she was making  
25          a decision.

1 the record without any question  
2 for the reasons that I stated  
3 regarding the objections to the  
4 document.

5 THE WITNESS: Oh. Did you ask  
6 if you read it correctly? Yeah,  
7 you did. Yes, you did.

8 (BY ATTORNEY O'LAUGHLIN):

9 Q. Okay. Do you recall ever  
10 being confronted with these types of  
11 concerns while you were Attorney  
12 General?

13 ATTORNEY ACKERMAN: Object to  
14 form, vague.

15 THE WITNESS: Confronted with  
16 those concerns? By the time I  
17 became Attorney General, I was --  
18 I was very concerned about the  
19 situation.

20 When I came onboard, at that  
21 point in time, there were just --  
22 all of this, you know, information  
23 were swirling around the media  
24 with respect to what had been  
25 going on on -- on pedo- -- what

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1 they called Pedophile Island,  
2 unfortunately, on the Little St.  
3 James.

4 That the horrendous things  
5 that had been happening, the --  
6 the sex trafficking and all of  
7 that, it was just mind-boggling to  
8 me not -- not to mention  
9 horrific.

10 I -- and so I don't even know  
11 if anybody had come to me for it.  
12 It was just so outrageous. This  
13 is -- the Virgin Islands is my  
14 home. And it was mind-boggling to  
15 me how -- if this is all true, how  
16 that could have been gone on --  
17 going on for years, and nothing  
18 and no one is doing anything.

19 So to tell you the truth, I  
20 mean, I can't -- there was a lot  
21 of media stuff and all of that. I  
22 -- you know, I inquired to see if  
23 there were any complaints that  
24 came in. Like how could this be?

25 So I inquired to VIPD. I

1 inquired our office to find out  
2 what, if any, complaints or  
3 anything came in to the office, or  
4 maybe even pending, that all this  
5 could possibly be going on and --  
6 and could possibly have been going  
7 on and nothing has -- I don't --  
8 you know.

9 So for me, I'm looking at  
10 this. I am seeing how outraged.  
11 I can't -- I had the same or even  
12 worse, but I can't say like saying  
13 that everybody knew. I don't know  
14 that. I know she stated that.

15 And -- and I know Ms. Lewis  
16 very well, and she's quite an  
17 advocate that I work together  
18 with. But I clearly see her  
19 outrage. That's what I'm seeing  
20 there.

21 What I saw and what I came and  
22 what I heard, what was going  
23 around, what was swirling around.  
24 Oh, definitely. I was very much  
25 aware of that, but it -- it just



1 was -- it was horrendous and  
2 baffling and mind-boggling.

3 (BY ATTORNEY O'LAUGHLIN):

4 Q. Did Ms. Lewis reach out to you  
5 personally?

6 A. Read out to me particularly  
7 this matter?

8 Q. Yeah, about Epstein.

9 A. No. I have met with Ms. Lewis  
10 because we had joined together to work  
11 on -- you know, together on several  
12 things with the resource center  
13 regarding the sex trafficking in  
14 general and the prevention and getting  
15 some -- you know, finding out and  
16 informing the public as far as what is  
17 -- what it is and what is going on.

18 So she was very instrumental  
19 in that in the public relations aspect  
20 as well as being able to get out to  
21 the victims, possible victims of  
22 sexual assault. Not only sex  
23 trafficking, but I did do a show with  
24 her on sex trafficking alone.

25 But -- but on, you know,

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1 getting victims some kind of, you  
2 know, kind of help. What people can  
3 do. What people can do if they see  
4 signs of sex trafficking and that sort  
5 of thing so that we don't -- this  
6 doesn't happen again.

7 I don't know how it happened.  
8 I don't know. But since I'm here now,  
9 as far as I'm concerned, April of 2019  
10 they said it happened. Well, I want  
11 to find out what happened because  
12 something went on that this thing went  
13 by for so many years. It was  
14 mind-boggling. So I -- at that point  
15 that's why I really wanted to do  
16 something.

17 So you're referencing what was  
18 said here. I clearly feel her outrage  
19 and share it. She -- no, she did not  
20 specifically come to me to talk to me  
21 about this. I don't know, you know if  
22 it did with the Attorney General's  
23 Office previously. I don't know. I  
24 don't know. I can't speak to what  
25 happened before I got there. I could

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1 just speak for what happened when I  
2 got there.

3 Q. So when you got there and you  
4 felt strongly that you wanted to do  
5 something --

6 A. Uh-huh.

7 Q. -- what were the things you  
8 did?

9 A. Well, what I did first -- and  
10 keeping in mind that I first came, and  
11 I have a complete department to run,  
12 and there are crises going on in  
13 various departments. It's -- the  
14 department is critically understaffed,  
15 and there were many things.

16 But what I did with respect to  
17 that in hearing all these things is  
18 first, as I indicated, I made a  
19 general -- you know, just an inquiry  
20 to find out do we have cases? Do we  
21 have a record of anyone complaining or  
22 any -- anyone complaining about seeing  
23 something that looked suspicious on  
24 Little St. James or -- or with respect  
25 to Jeffrey Epstein in particular.

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1           And I -- but mainly with law  
2 enforcement. So I inquired with VIPD,  
3 you know, to see if there's anything,  
4 if they could look in their records  
5 and the Department of Justice. I  
6 didn't do that with the federal  
7 authorities who were also there  
8 because they're -- you know, they're  
9 not going to disclose if there's a  
10 pending investigation or anything like  
11 that.

12           But I did not inquire with  
13 them, but -- and I found that  
14 the first -- that's the first thing  
15 that I did and found that there was --  
16 there was nothing. Everything I got  
17 back was that they didn't have any  
18 record of anything.

19           And so that's the first thing.  
20 And at that point in time, also what  
21 had been transpiring was not only the  
22 sex offender, the request that was --  
23 we were dealing with, but then I came  
24 to understand or I had the -- just say  
25 it was my understanding upon

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1 information and belief and that the  
2 federal authorities were investigating  
3 Jeffrey Epstein also, but -- and then  
4 later on there was the prosecution.

5 Q. So there was a lot in that  
6 answer. So let's unpack it.

7 A. Yeah, but to be -- you asked  
8 me what did I do --

9 Q. Sure.

10 A. -- after.

11 Q. So you reached out to DOJ and  
12 the VIPD?

13 A. Yes, and I --

14 Q. That was one thing?

15 A. Yeah.

16 Q. And both of them came back and  
17 reported that there was --

18 A. Right.

19 Q. -- what?

20 A. That they had seen -- in the  
21 records, they had not seen any reports  
22 of any complaints that came in. That  
23 would be something that, you know, of  
24 course complaints that came in  
25 regarding sexual assault trafficking

1 or, you know, that sort of thing would  
2 have been going on on the island.

3 Q. And then what did you do after  
4 you found out it came back that there  
5 were no complaints?

6 A. I just -- well, I guess  
7 personally I didn't -- well, what I  
8 did was at that point in time, I just  
9 started to really read a lot of the --  
10 of the reports, and it's -- it's news  
11 media reports.

12 Which is fairly hearsay to  
13 hear -- to just get the gist of what  
14 is being said even though I know that  
15 you can't -- I can't just rely on --  
16 on news media. I can't do that.

17 You know, it's rumor,  
18 innuendo. But to see where they're  
19 getting this information from and  
20 what's happening because it became  
21 even more of a curiosity for me and  
22 thinking this is something we -- we  
23 got to do something about, you know.

24 I don't know what happened  
25 then, but I can't sit here and hear

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1 that all this happened, especially  
2 when under our statutes, sexual  
3 assaults and -- and child abuse are --  
4 have no statute of limitations.

5 So it wouldn't have been too  
6 late to do anything if we had solid  
7 evidence, because I can't go by  
8 innuendo. I can't go by rumor. I  
9 can't go by media reports and say,  
10 Okay, you know, let's, you know, do an  
11 investigation.

12 And then I was also critically  
13 short-staffed as well. I didn't have  
14 the resources either. But it was  
15 really where I was really  
16 contemplating what can be done.

17 But once learning or  
18 understanding that the federal  
19 authorities were investigating  
20 Mr. Epstein and prosecuting  
21 criminally, and there was -- there  
22 might have been a criminal  
23 investigation going on.

24 That is something that I would  
25 not do -- that it sort of preempts



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1 going and doing something when once  
2 the federal authorities or any other  
3 authorities have started a criminal  
4 investigation or that prosecutors.

5 They made the arrest. Then  
6 that's sort of under, I think it's  
7 called the First Forum Rule. It's --  
8 it's like in respect to the other  
9 forum, that you do not -- you know, we  
10 won't go and, you know, start up a  
11 prosecution when there's one already  
12 there.

13 So it's been -- it pleased me  
14 to see that something was being done  
15 with law enforcement organization that  
16 had the resources to be able to do it.  
17 So once I learned that that was  
18 happening. Okay, then at least  
19 something is being done. There's a  
20 prosecution.

21 And then I was very -- you  
22 know, try to be in-tuned with what it  
23 is and what the charges were once he  
24 was arrested, and looking forward to  
25 seeing Jeffrey Epstein brought to



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1 justice. But also hearing more about  
2 what happened and what part Little St.  
3 James may have played in it.

4 Q. How did you learn that a  
5 federal investigation was being  
6 done?

7 A. I did not learn it for sure,  
8 but I -- I don't recall exactly how --  
9 there were certain questions that  
10 might have been asked or something  
11 that I -- I just sensed that there was  
12 an investigation going on.

13 And I can't -- and it's not  
14 something that I could -- would even  
15 disclose, of course, even if I knew.  
16 But I sensed that one was going on.

17 Q. Questions asked by who?

18 A. I can't tell you that. You  
19 know, I mean, if there -- I just don't  
20 recall exactly, but I think something  
21 I read or something and in my mind I  
22 said, Okay. That means that the  
23 federal authorities must be  
24 investigating.

25 That was my conclusion. It

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1 must have been from the media that I'd  
2 been reading and the way things were  
3 going, different things that were  
4 said, that, you know, there's a  
5 possibility that that's happening.

6 At the same time, Jeffrey  
7 Epstein had gone on another trip with  
8 our -- well, which he had reported to  
9 Europe. And so I recall speaking with  
10 Shani and saying, you know, all the  
11 reports -- she assured me that he did  
12 do the reporting as required.

13 But yeah, I sensed that. And  
14 it turned out that my senses, my hunch  
15 came out to be true because then he  
16 was arrested July, in July. I think  
17 July 10th.

18 ATTORNEY ACKERMAN: Counsel,  
19 when you get a chance, I could use  
20 a break. I'm not saying -- I'm  
21 not asking for one now, just  
22 saying when it's a good --

23 THE WITNESS: Sure.

24 ATTORNEY ACKERMAN: --  
25 breaking point.